

**IN THE DISTRICT COURT FOR THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>v.</b>	)	<b>CR. No.: 2:07CR11-MHT</b>
	)	
<b>KEVIN ONEIL BROWN</b>	)	

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**MOTION FOR PSYCHOLOGICAL EXAMINATION**

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**COMES NOW** William R. Blanchard, appointed counsel for the Defendant, **KEVIN ONEIL BROWN**, and respectfully requests that this Honorable allow payment of fees to a forensic psychologist in excess of the amount allowable without prior approval. In support of this motion, the undersigned shows as follows:

1. In the course of preparing for the defense and trial of this matter, I have uncovered information tending to indicate that the Defendant may not be mentally competent, and that his mental status at the time of the alleged offense may be questionable. In particular, it has been reported to me that the Defendant has complained of visual and auditory hallucinations, and the Defendant himself reports that he is disabled due to the effects of a head injury.
2. I wish to have the Defendant submitted to a defense psychological examination in order to fully explore the issues of his mental competence and mental state at the time of the alleged crime. I have spoken with Catherine Boyer, a forensic psychologist, who is willing to undertake and complete the evaluation, and can do so by the end of the first week of December 2006. Dr. Boyer estimated that the cost of the evaluation would range

between \$1,600.00 and \$2,000.00. The exact figure would depend upon how much objective psychiatric testing might be needed to complete the evaluation.

3. This case was preceded by United States v. Kevin O'Neal Brown, CR. NO.:2:06CR206MHT, and embraces the same facts and charge as that case. The Court approved funds for Dr. Boyer's evaluation in that case, and the evaluation was begun. However, it was not completed until this successor case was brought and the first case dismissed. This Motion is therefore filed in order that counsel may fully compensate Dr. Boyer for her evaluation of Mr. Brown, which was carried out in part during the pendency of both cases.
4. The Defendant, Kevin Oneil Brown, is indigent and cannot afford to pay for the services of a forensic psychologist.
5. Based upon the above, counsel requests fees of up to \$2,000.00 for the services of Dr. Catherine Boyer in performing a defense psychological evaluation of Kevin Oneil Brown.

**WHEREFORE**, counsel for the Defendant prays that this Honorable Court will allow payment of fees to a forensic psychologist in excess of the amount allowable without prior approval.

**RESPECTFULLY SUBMITTED** this 15<sup>th</sup> day of November 2007.

s/ William R. Blanchard  
WILLIAM R. BLANCHARD  
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**CERTIFICATE OF SERVICE**

I hereby certify that on November 15, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: AUSA Chris Snyder, and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants: n/a.

Respectfully submitted,

s/ William R. Blanchard  
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